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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEEP WOODS HOLDINGS, LLC,

Plaintiff,

v.

SAVINGS DEPOSIT INSURANCE FUND OF
THE REPUBLIC OF TURKEY,

Defendant.

07-CV-934 (AKH)

NOTICE OF MOTION TO COMPEL

PLEASE TAKE NOTICE that, upon the attached Declaration of James S. O'Brien, Jr., dated January 13, 2012, with the exhibits attached thereto, the accompanying Memorandum of Law, dated January 13, 2012, and all of the prior proceedings had herein, the undersigned will move this Court before the Honorable Alvin K. Hellerstein, in Room 14D at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be directed by the Court, for an Order granting Plaintiff Deep Woods Holdings, LLC's motion pursuant to Federal Rule of Civil Procedure 69 directing and compelling nonparties Turkiye Vakiflar Bankasi T.A.O. and T.C. Ziraat Bankasi A.S. to fully respond to the Information Subpoenas dated September 19, 2011 and the Supplemental Information Subpoenas dated November 8, 2011 directed to those entities and served upon them by Registered Mail, Return Receipt Requested, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
January 13, 2012

PRYOR CASHMAN LLP

By: _____ s/
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